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6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 QBE INSURANCE CORPORATION,  
9 individually,

CASE NO.: 2:20-cv-02104-RFB-EJY

10 Plaintiff,

11 vs.

12  
13 SIMONE RUSSO, RICHARD DUSLAK and  
JUSTIN SESMAN,

14 Defendants.

15 RICHARD DUSLAK and JUSTIN SESMAN,

**STIPULATION & ORDER TO EXTEND**  
**DISCOVERY DEADLINES**  
**(SECOND REQUEST)**

16 Counterclaimants,

17 vs.

18 QBE INSURANCE CORPORATION,

19 Counter-Defendants.  
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1 RICHARD DUSLAK and JUSTIN SESMAN,

2 Third-Party Plaintiffs,

3 vs.

4 SUNRISE VILLAS IX HOMEOWNERS'  
5 ASSOCIATION; AMANDA DAVIS; DOES I-X  
6 AND ROE BUSINESS ENTITIES I-X,

7 Third-Party Defendants.

8  
9 **STIPULATION & ORDER TO EXTEND DISCOVERY DEADLINES**  
10 **(SECOND REQUEST)**

11 Defendants/Counterclaimants/Third-Party Plaintiffs RICHARD DUSLAK and JUSTIN  
12 SESMAN, Third-Party Defendant SUNRISE VILLAS IX HOMEOWNERS' ASSOCIATION,  
13 Plaintiff/Counter-defendant QBE INSURANCE CORPORATION and Defendant SIMONE RUSSO,  
14 by and through their respective counsel of record, do hereby stipulate to extend deadlines in this  
15 matter, for a period of ninety (90) days, for the reasons explained herein.

16 Pursuant to Local Rule 6-1(b), the parties hereby aver that this is the second such discovery  
17 extension requested in this matter.

18 **DISCOVERY COMPLETED TO DATE**

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- 20 1. The Parties have conducted an F.R.C.P. 26(f) conference and have served their respective
  - 21 F.R.C.P. 26(a) disclosures and supplements thereto;
  - 22 2. The Parties have served written discovery on one another;
  - 23 3. The Deposition of Marie Spencer was conducted on May 10, 2021; and
  - 24 4. The Deposition of Rita Ehresman was conducted on May 21, 2021.
- 25

26 **DISCOVERY TO BE COMPLETED AND REASONS FOR EXTENSION OF DISCOVERY**

- 27 1. Additional written discovery;
- 28 2. Depositions of additional fact witnesses;

3. Deposition of Plaintiff's F.R.C.P. 30(b)(6) Witness;
4. Deposition of Defendants/Counterclaimants/Third-Party Plaintiffs; and
5. Depositions of expert witnesses and rebuttal expert witnesses.

The parties aver, pursuant to Local Rule 6-1, that good cause exists for the requested extension. The parties agree that, pending this Court's approval, extension of remaining discovery deadlines is appropriate, as Defendants/Counterclaimants/Third-Party Plaintiffs cannot appear for their depositions until the end of August 2021 and there remains a number of fact witnesses to be deposed. Further, the number of parties, and counsel, in this matter has created scheduling conflicts.

**[PROPOSED] NEW DISCOVERY DEADLINES**

Last Date to Add Parties/Amend	September 22, 2021
Expert Disclosure Deadline	October 22, 2021
Joint Interim Status Report	October 22, 2021
Rebuttal Expert Disclosure Deadline	November 22, 2021
Discovery Cut-Off Date	December 22, 2021
Dispositive Motion Deadline	January 21, 2022
Proposed Joint Pre-Trial Order	February 22, 2022

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1 If this extension is granted, all anticipated additional discovery should be concluded within  
2 the stipulated extended deadline. The parties aver that this request for extension of discovery deadlines  
3 is made by the parties in good faith and not for the purpose of delay.

<p>4 DATED this <u>28<sup>th</sup></u> day of June, 2021.</p> <p>5 <b>BIGHORN LAW</b></p> <p>6</p> <p>7 By: <u>/s/ Kimball Jones</u></p> <p>8 <b>KIMBALL JONES, ESQ.</b></p> <p>9 Nevada Bar No.: 12982</p> <p>10 2225 E. Flamingo Rd.</p> <p>11 Building 2, Suite 300</p> <p>Las Vegas, Nevada 89119</p> <p><i>Attorneys for Defendants/Counterclaimants/ Third-Party Plaintiffs</i></p>	<p>DATED this <u>28<sup>th</sup></u> day of June, 2021.</p> <p><b>LINCOLN, GUSTAFSON &amp; CERCOS, LLP</b></p> <p>By: <u>/s/ Shannon G. Splaine</u></p> <p><b>SHANNON G. SPLAINE, ESQ.</b></p> <p>Nevada Bar No.: 8241</p> <p>3960 Howard Hughes Pkwy., Suite 200</p> <p>Las Vegas, Nevada 89169</p> <p><i>Attorneys for Third-Party Defendant, SUNRISE VILLAS IX HOMEOWNERS' ASSOCIATION</i></p>
<p>12 DATED this <u>28<sup>th</sup></u> day of June, 2021.</p> <p>13 <b>MORALES, FIERRO &amp; REEVES</b></p> <p>14</p> <p>15 By: <u>/s/ William C. Reeves</u></p> <p>16 <b>WILLIAM C. REEVES, ESQ.</b></p> <p>17 Nevada Bar No.: 8235</p> <p>600 South Tonopah Drive, Suite 300</p> <p>Las Vegas, Nevada 89106</p> <p>18 <i>Attorneys for Plaintiff/Counter-Defendant</i></p>	<p>DATED this <u>28<sup>th</sup></u> day of June, 2021.</p> <p><b>THE LAW OFFICE OF DAVID SAMPSON, LLC</b></p> <p>By: <u>/s/ David F. Sampson</u></p> <p><b>DAVID F. SAMPSON, ESQ.</b></p> <p>Nevada Bar No.: 6811</p> <p>630 South 3rd Street</p> <p>Las Vegas, Nevada 89101</p> <p><i>Attorneys for Defendant, SIMONE RUSSO</i></p>

19 IT IS SO ORDERED:

20 

21 **UNITED STATES MAGISTRATE JUDGE**

22 **DATED:** June 28, 2021